

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ROBERT KOLINEK, individually and)
on behalf of all others similarly situated,)

Plaintiff,)

v.)

WALGREEN CO., an Illinois corporation,)

Defendant.)

Case No. 13-cv-04806

Hon. Matthew F. Kennelly

DECLARATION OF W. ALLEN MCDONALD

Pursuant to 28 U.S.C. Section 1746, I, W. Allen McDonald, declare and state as follows:

1. I am an adult over the age of 18 and a citizen of the State of Tennessee. I am fully competent to make this declaration and have personal knowledge of all matters set forth herein. I could and would testify to such matters if called as a witness in this action.

2. Chris Cain did not ghost-write the objection filed on behalf of Melinda Erin Franz.

3. However, Mr. Cain and I do work together on cases, and currently we are class counsel for two related class actions in the Eastern District of Tennessee, Larry P. Lowell, et. al. v. Summer Bay Management, L.C., Nos 3:13-cv-00229 and 3:14-cv-00296.

4. In addition, Mr. Cain and I have filed two other class actions recently. Mr. Cain and I recently traveled to Florida for a court hearing in those matters, In re Disposable Contact Lens Antitrust Litigation, 3:15-md-2626 (M.D. Fla.).

5. Because of the cases in which Mr. Cain and I are co-counsel, we speak on a regular basis, at least multiple times per week.

6. In the context of our working relationship as co-counsel in other matters, Mr. Cain and I routinely bounce ideas off of each other, and I discussed Mrs. Franz's objections to the settlement in this matter with Mr. Cain before filing the objection. I am aware of no rule of law or professional conduct which would prohibit me from discussing this matter with Mr. Cain or other persons from whom I deem appropriate to seek input.

7. However, Mr. Cain did not ghost-write any portion of the objection.

8. I have known Mr. Cain since approximately 1997 when I was an associate at the law firm of Arnett Draper and Hagood in Knoxville, Tennessee and Mr. Cain clerked at that firm. In 1998, I accepted a position as assistant general counsel for the Sea Ray Boat Group Division of Brunswick Corporation. While at Sea Ray, in my role as assistant general counsel in charge of litigation across the United States, I hired Mr. Cain and his partner, Thomas S. Scott, Jr., to represent Sea Ray and Brunswick on numerous occasions. After I left Brunswick, Mr. Cain and I were employed in the same office and have maintained a professional relationship since that time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 11th day of August, 2015 in Knoxville, Tennessee.

/s/ W. Allen McDonald
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